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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA
VIVAS CASTILLO, A.C.A., SHERIKA BLANC,
VILES DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-1766-EMC

**DECLARATION OF A.C.A. IN SUPPORT
OF PLAINTIFFS' UNOPPOSED
ADMINISTRATIVE MOTION TO
PROCEED UNDER PSEUDONYM**

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DECLARATION OF A.C.A.

I, A.C.A., declare:

1. I have personal knowledge of the facts set forth in this declaration. If called upon to testify as a witness, I could do so and would testify to these facts.

2. I am writing this declaration to explain the reasons that I wish to proceed anonymously. While it is important to me to speak out against the decision to end TPS for Haiti, I am afraid that doing so may put me at risk of retaliation, deportation, or other harms.

3. It is important to me to participate in this lawsuit both because I rely on TPS and would be harmed if the court does not act to protect the TPS designation for Haiti; and because I believe that the decision to end the current designation of TPS for Haiti early is based on racism on the part of DHS Secretary Noem and President Trump as well as other government officials. Hardworking people like me and other TPS holders from Haiti are not a threat to the people of the United States, but Trump and others have repeatedly called us criminals and spread racist lies about Haitian immigrants eating people's pets.

4. I am afraid that using my name publicly in this lawsuit and speaking out against the actions of the government may put me at risk of detention or deportation. Just last week, I read the news about the graduate student in New York who was arrested by ICE because he protested against the war in Gaza. He even had a green card, which I believe should provide him much more protection than I have, but ICE arrested him and is trying to deport him anyway. If green card holders aren't able to criticize the government without being targeted for deportation, what does that mean for TPS holders like myself? I also read news articles about immigrants being detained by ICE even though they had pending applications for legal status and did not have any criminal history. Because of these actions of the government, I am afraid that participating in this lawsuit using my full name would make me a target for ICE to detain me.

5. Someday, I hope to obtain permanent status in the United States. My brother is a U.S. citizen, and I have an approved visa petition that may allow me to adjust my

1 status in a few years. I worry that participating in this lawsuit could jeopardize any future
2 applications for immigration relief because I fear that I may be retaliated against when any
3 immigration application I file comes up for review, whether or not that would be legal for
4 the government to do.

5 6. I also fear retaliation from local authorities or private citizens who harbor
6 anti-immigrant sentiment. I live in Florida, a state which is becoming increasingly hostile
7 to immigrants. Florida Governor Ron DeSantis has signed a number of recent bills aimed
8 at criminalizing people without immigration status. For example, it is now a crime to enter
9 Florida if you are undocumented. I am afraid that, if I use my name publicly and people
10 know that I have TPS, I could face harassment from local authorities or people who do not
11 want Haitian immigrants in the United States.

12 7. In my daily life, I do not share my immigration status with anyone except
13 those very close to me. You never know how people feel about immigrants, so I am
14 cautious when I meet new people. It does not feel good to hide a part of myself, but
15 unfortunately this is the reality I and millions of other immigrants are facing due to the
16 actions and statements of the government.

17 8. For all these reasons, I respectfully request permission to proceed as a
18 plaintiff under pseudonym.

19 I declare under penalty of perjury that the foregoing is true and correct, and that this
20 declaration was executed in Florida this 17th day of March, 2025.

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23 A.C.A.
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